

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
Case No: 5:12-cv-00069-H

ROSE LORENZO, and all others similarly
situated,

Plaintiff,

v.

PRIME COMMUNICATIONS, L.P., a
Texas General Partnership,

Defendant.

PETITION FOR AWARD OF
ATTORNEYS' FEES AND COSTS IN
ACCORDANCE WITH RULE 68(a)
OFFERS OF JUDGMENT

Plaintiffs Keith Archie, Mike Arwine, Jr., Karalena Cook (Missig), James Kyle Goins, James Huebel, Sarah Kerchinski-Hetrick, Lijo Kurian, James Meador, Tyler Missig, Roxanne Montgomery, Guy Rodriguez, Jiwa Saivazali, Victor Smith, Jay Michael Turner, Amanda Webb, Allyn Weimer, Charlotte D. Woodring-Sneddon, Jessica Wynkoop and Cynthia B. Young, the nineteen (19) Plaintiffs on whose behalves judgment as to all asserted FLSA claims has been entered, [Docs 224-242], in accordance with accepted Rule 68 Offers of Judgment [Docs 212 & 212-1], and pursuant to Rule 54 of the Federal Rules of Civil Procedure, move this Court for an award of reasonable attorneys' fees in the amount of \$120,215.28 and costs in the amount of \$4,664.14 on the grounds set forth in their Memorandum in Support and related documents, filed contemporaneously herewith:

Dated: November 9, 2016.

Respectfully submitted,

**Counsel for Keith Archie, Mike Arwine, Jr.,
Karalena Cook (Missig), James Kyle Goins,
James Huebel, Sarah Kerchinski-Hetrick, Lijo**

**Kurian, James Meador, Tyler Missig, Roxanne
Montgomery, Guy Rodriguez, Jiwa Saivazali,
Victor Smith, Jay Michael Turner, Amanda
Webb, Allyn Weimer, Charlotte D. Woodring-
Sneddon, Jessica Wynkoop, Cynthia B. Young.**

By their Undersigned Attorneys

/s/ Stephen A. Dunn

Stephen A. Dunn

State Bar No. 12389

sdunn@emanuelanddunn.com

Michael Dunn

State Bar No. 47713

EMANUEL & DUNN

Post Office Box 426

Raleigh, North Carolina 27602

(919) 832-0329 (PHONE)

(919) 832-0731 (FAX)

/s/ Harris D. Butler, III

Harris D. Butler, III

VA State Bar No. 26483

harris.butler@butlerroyals.com

Zev H. Antell

Virginia State Bar No. 74634

zev.antell@butlerroyals.com

BUTLER ROYALS, PLC

140 Virginia Street, Ste. 302

Richmond, Virginia 23219

(804) 648-4848 (PHONE)

(804) 648-6814 (FAX)

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing PETITION FOR AWARD OF ATTORNEYS' FEES AND COSTS IN ACCORDANCE WITH RULE 68(a) OFFERS OF JUDGMENT with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following counsel of record:

William W. Pollock, Esquire
John B. Walker, Esquire
Ragsdale Liggett, PLLC
Post Office Box 31507
Raleigh, NC 27622-1507
bpollock@rl-law.com
bwalker@rl-law.com

This the 9th day of November, 2016

/s/ S. Michael Dunn

S. Michael Dunn
State Bar No. 47713
mdunn@emanuelanddunn.com
EMANUEL & DUNN
Post Office Box 426
Raleigh, North Carolina 27602
(919) 832-0329 (PHONE)
(919) 832-0731 (FAX)